

LJF:AMC

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

M-09-750

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UNITED STATES OF AMERICA

- against -

RALF TREIMAN,  
also known as "Mark Anthony  
Robbins,"

COMPLAINT AND AFFIDAVIT  
IN SUPPORT OF APPLICATION  
FOR ARREST WARRANT

(T. 18, U.S.C., § 1542)

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

SEAN BAER, being duly sworn, deposes and states that he is a Special Agent with the Department of State, duly appointed according to law and acting as such.

On or about September 27, 2006, within the Eastern District of New York, the defendant RALF TREIMAN, also known as "Mark Anthony Robbins," did willfully and knowingly use and attempt to use a passport the issuance of which was secured by reason of a false statement.

(Title 18, United States Code, Section 1542).

The source of your deponent's information and the grounds for his belief are as follows:<sup>1/</sup>

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<sup>1/</sup> Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

1. I am a Special Agent with the United States Department of State and have been involved in the investigation of numerous cases involving passport fraud. I am familiar with the facts and circumstances set forth below from my participation in the investigation, my review of the investigative file, and from reports of other law enforcement officers involved in the investigation.

2. On or about April 23, 2002, the defendant RALF TREIMAN applied for a United States passport. This application warned that: "[F]alse statements made knowingly and willfully in passport applications including affidavits or other supporting documents submitted therewith, are punishable by fine and/or imprisonment under the provisions of 18 USC 1001, 18 USC 1542, and/or 18 USC 1621." On the application, Form DS-11, TREIMAN stated, under penalty of perjury, that he had never applied for or been issued a United States passport. Specifically, question 18 asked: "Have you ever been issued a U.S. passport?" In this application, Form DS-11, the defendant represented (1) his name to be Mark Anthony Robbins and (2) his date of birth to be May 17, 1960. In the presence of a Passport Acceptance Clerk at the Flatbush Postal Acceptance Office in Brooklyn, New York, TREIMAN signed the oath on Form DS-11 swearing that the statements made in the application were true and correct and that the photograph attached was a true likeness of him. A United States passport,

passport number 301765554, was subsequently issued to defendant in the name of Mark Anthony Robbins.

3. I have reviewed of a copy of the application for United States passport number 301765554, which is in the name of "Mark Anthony Robbins" but includes a photograph of the defendant RALF TREIMAN.

4. An investigation has revealed that on December 20, 2005, the defendant RALF TREIMAN filed another application for a United States passport. In that application, he stated that his name was Nat Clifford Holt with a date of birth of July 31, 1948. I have reviewed this application for a United States passport in the name of Nat Clifford Holt and determined that it includes a photograph of the defendant RALF TREIMAN. In the application, TREIMAN signed the oath on Form DS-82 swearing that the statements made in the application were true and correct and that the photograph attached was a true likeness of him.

5. I have compared the signatures on each of the above-mentioned passport applications and, although for different names, the handwriting and signatures appear to have been made by the same person. Furthermore, on each application the defendant RALF TREIMAN listed his occupation as "painter."

6. The fingerprints of the defendant RALF TREIMAN have been matched to three arrests in California under defendant's own name "Ralf Treiman." I have identified a

separate individual, who is not TREIMAN, with the name Mark Anthony Robbins, date of birth May 17, 1960. Robbins is an individual with a long criminal history in Oregon. TREIMAN's fingerprints do not match those of Mark Anthony Robbins.

7. The defendant RALF TREIMAN's fingerprints also match a thumbprint from the defendant's Alien File in the custody of Immigration and Customs Enforcement under the name "Ralf Treimann." According to the defendant's Alien File, the defendant, a citizen of Estonia, was ordered deported from the United States on May 29, 1997. I have examined a copy of Soviet Passport number LA526057 issued in the name of "Ralf Treimann" contained in the above-described Alien File that bears a photograph of TREIMAN. I have also examined Estonian Passport number K4080276 issued in the name of "Ralf Treiman." I am informed by Estonian consulate officials in New York that Estonian Passport number K4080276 was issued to an individual named "Ralf Treiman." Estonian Passport number K4080276 also bears a photograph of TREIMAN.

8. A review of Department of Homeland Security, Customs and Border Patrol ("CBP") database records indicate that on September 27, 2006, the defendant RALF TREIMAN entered the United States at John F. Kennedy airport in Queens, New York from Helsinki, Finland by presenting United States passport number

301765554, in the name of Mark Anthony Robbins, date of birth May 17, 1960.<sup>2/</sup>

9. An investigation has revealed that the defendant RALF TREIMAN was previously arrested in Helsinki, Finland on December 27, 1995, for fraud-related charges. I examined an arrest photograph from the Finnish arrest and it appears to be the defendant RALF TREIMAN.

WHEREFORE, your deponent respectfully requests that the defendant RALF TREIMAN, also known as "Mark Anthony Robbins," be dealt with according to law.



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Sean Baer  
Special Agent  
Department of State

Sworn to before me this  
27th day of July, 2009

UNITED STATES MAGISTRATE JUDGE  
EASTERN DISTRICT OF NEW YORK

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<sup>2</sup> A review of CBP database records indicates that TREIMAN presented the same United States passport on three other dates at John F. Kennedy Airport: January 16, 2003, July 1, 2003 and February 17, 2006.